

**REMARKS**

The claims were objected to. Correction is made as suggested. Withdrawal of the objection is requested.

Claims 1, 2, and 4 were rejected under §102 over Takamoto '860. This rejection is respectfully traversed.

(1) Takamoto does not disclose strips of a same width, as now claimed. All of the applied features 28, 14, and 26a are of different widths. The Examiner is invited to note the outlines in Fig. 1B.

New claims 16 and 18 still further distinguish.

(2) The applied features 28, 14, and 26a are not parallel "strips" but rather parts of a capacitor 28 with two rectangular capacitor plates 22 and 24. The square vias 26a cannot anticipate the claimed third strip because they cannot be said to be "lengthwise mutually parallel" to anything (as claim 1 now recites): they have no length because they are square.

(3) Takamoto does not disclose a power supply line, it discloses a capacitor. No power is transmitted through the capacitor plates. New dependent claim 23 more explicitly recites a feature not disclosed by Takamoto, electrical connection at the ends of the strips, which produces lengthwise conduction of electricity.

(4) New independent claim 21 distinguishes over the reference because of "consisting" in the preamble. Takamoto discloses many other features.

Claims 3 and 5-7 were rejected under §103 over Takamoto in view of Appel '292. This rejection is respectfully traversed.

Takamoto is concerned with parasitic capacitance (col. 1, line 17 to col. 2, line 45) and reduces it by shielding the capacitor with a grounded conductor placed next to the non-grounded

capacitor electrode. In Fig. 1A of the reference, grounded conductor 14 shields non-grounded capacitor plate 22 and the connected parts 16, 18a, and 20a.

Appel is not concerned with shielding, but with maximizing capacitance for a given chip area (¶¶ 7 and 8). Appel shows a capacitor with equal numbers of lines on both sides (e.g., Fig. 1) because this arrangement maximizes the capacitance per electrode.

With respect, the person of ordinary skill would not have combined these two references because their objects and teachings are different.

Allowance is requested.

Respectfully submitted,



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September 20, 2006

Date